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May 5, 2006

Ms. Britta L. Bloomberg
Deputy State Historic Preservation Officer
Minnesota Historical Society
345 Kellogg Boulevard West
Saint Paul, MN 55102-1906

Re: STB Docket No. AB-6 (Sub. No. 438X), BNSF Railway Company—
Abandonment Exemption— in Morrison County, MN

Dear Ms. Bloomberg:

I represent BNSF Railway Company ("BNSF") in the above-referenced docket number. On March 27, 2006, BNSF filed a notice of exemption seeking formal authority from the Surface Transportation Board ("Board") to abandon .58 miles of railroad line that extended between BNSF's milepost 113.44 and milepost 114.02, near Camp Ripley, Morrison County, MN (also referred to as the Brainerd Branch of the former Northern Pacific Railroad). The Board's Section of Environmental Analysis ("SEA") issued an Environmental Assessment ("EA"), served April 21, 2006, regarding the notice of exemption. The EA recommended that BNSF consult with your agency and report back to SEA regarding any consultations with your agency and any other Section 106 parties.

By way of background, an April 2002 Memorandum of Agreement ("MOA") concerning improvements to Trunk Highway 371 notes that the Federal Highway Administration "has determined that these improvements will have an adverse effect on the Hummingbird Mound site and the Brainerd Branch of the Northern Pacific Railroad." (Attachment 1).

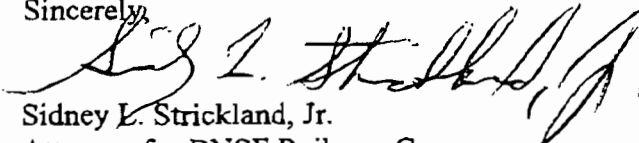
In a July 24, 2003 letter from the Minnesota Department of Transportation ("Mn/DOT") to your office, Mn/DOT indicated that it reviewed the Trunk Highway 371 project pursuant to Section 106 of the National Historic Preservation Act, as amended (36 CFR 800), and found that the project would not diminish the applicable National Register qualities of the Camp Ripley properties and would not result in any additional effects to the National Register properties within the project's area of potential effect.

By letter dated November 5, 2003, you responded on behalf of your agency to the aforementioned correspondence from Mn/DOT. Your letter similarly indicated the project will have no adverse effect on historic resources (Attachment 3).

Your previous statements indicate that a Section 106 analysis has been completed for the Trunk Highway 371 project, which included the Brainerd Branch properties, and I am prepared to advise the Board as such.

I seek your concurrence that no further mitigation under the Section 106 process and no further analysis is needed. Please respond at your earliest convenience. If you have additional concerns, I can be reached at (202) 338-1325.

Sincerely,



Sidney L. Strickland, Jr.
Attorney for BNSF Railway Company

SLS/cac
Enclosures

cc: Mr. Dennis Gimmestad
Minnesota Historical Society



Minnesota Department of Transportation

Attachment No. 2

Transportation Building
395 John Ireland Boulevard
Saint Paul, Minnesota 55155-1899

July 24, 2003

Mr. Dennis Gimmestad
State Historic Preservation Office
Minnesota Historical Society
345 Kellogg Blvd. W.
St. Paul, MN 55101-1906

re: SP 4912-48/ reconstruction of TH 371
SHPO Number 2001-1501/MOA

Dear Mr. Gimmestad,

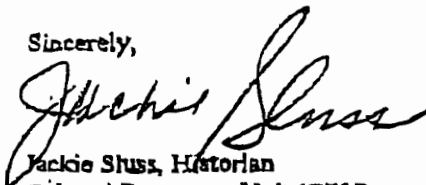
We have reviewed the above-referenced undertaking pursuant to our FHWA-delegated responsibilities for compliance with Section 106 of the National Historic Preservation Act, as amended (36 CFR 800). A Memorandum of Agreement (MOA) for this project was signed in April 2002. At the time of the earlier review, it was not known whether the project would include changes to the western Camp Ripley entrance at the intersection of TH 371 and TH 115. Those plans are now available (see enclosed). The project has the potential to affect the Y-shaped entrance to Camp Ripley. The entry is physically and visually defined by the Camp Ripley Walls (MO-GRE-047), a wall of dry-laid Little Falls Black Granite that is eligible for the National Register of Historic places. The walls are eligible under criteria A and C as an example of work completed by New Deal work-relief programs in Minnesota and as an example of the work of B. C. Betzenburg, an architect of statewide reputation. A 1998 report entitled *Historic Roadside Development Structures on Minnesota Trunk Highways* better defines the triangular landscape at this intersection and its contributing historic significance to the eligible Camp Ripley Walls property. The triangular rail wye may have influenced the design of the entrance from the beginning, the walls being designed outside the rail and the roadway placed north of each leg of the wye. The rail wye is part of the Northern Pacific's Brainerd Branch Line that was determined eligible for the National Register of Historic Places in the earlier July 2001 study for this project. The entrance landscape at TH 371 was designed by the Minnesota Highway Department (see enclosed 1942 plan) and called for junipers and pines thinned from those planted next to the stone wall, to be planted in the three corners of the grassy triangle.

The proposed new entry project will not encroach upon the stone wall or the trees parallel to it or the active BNSF railroad wye. However, in the reconfigured vehicular entrance to the National Guard camp, the northernmost leg of the roadway which lies between the tracks and the stone wall, will be removed, directing all traffic to a single intersection at the south leg. The current TH 371 will become a frontage road. The northern leg of the highway will be taken up and replaced with an 8'-10' bituminous bike path. The path will be more narrow than the existing 24' paved roadway but the route will follow the existing curve and will still be demarcated by the rail line, the stone wall, and trees. Consultation with David Swantek of the Minnesota Veterans Cemetery and Marty Skoglund of the Camp Ripley Environmental Office were consulted and would like to see the bike path constructed. They would also like to see the bike path cul-de-sac at the west end to ensure that vehicular traffic is prohibited. The south leg of TH 115, now a 26' bituminous surface with up to 5' gravel shoulders, will remain a free right turn but will be narrowed to 20' bituminous with a 2' gravel shoulder. About 500 feet from the intersection with current TH 371, a thru-lane will begin to taper away from the original leg to meet the current TH 371 at a right angle. This realignment has been designed to access a new interchange with the new TH 371 alignment. This road will accommodate the single 12' thru lane and a 13' left turn lane with 6' shoulders (two paved and four gravel) on either side. The result will be a small triangle of greenspace between the original leg and the new lane in the southeast corner of the original landscaped area. The triangular space will be 80' wide where it parallels TH 371. The new thru-lane, where it meets existing TH 371 will be located about 110 feet north, centerline to centerline, of the free right turn (the original leg). When the current TH 371 (to be frontage road) is narrowed by removing the concrete medians, an additional 8-16 feet at the east end of the triangle, more in line with the original dimensions. The intersection will be controlled with stop signs on the frontage road.

The net result of the changes will be relatively minor. Two of the major defining elements of the entry will remain unchanged: the stone wall and the railroad wye. A third defining element, the grassy triangular space at the center will remain largely in tact. Both wings of the rail wye and the flanking stone walls and the central triangular greenspace will still be visually coherent. In addition, the space will continue to read as an entrance. It will continue to facilitate traffic into and through the Camp. The north leg, although closed to vehicular traffic, will still accommodate pedestrian and bike traffic visiting the cemetery. Therefore it is our opinion that the project will not diminish the National Register qualities of the Camp Ripley entrance, its association with New Deal programs or their design and craftsmanship, and will not result in any additional adverse effects to the National Register properties within the project's area of potential effect. When final plans are drawn for the entrance, they will be sent to your office for review and consultation.

We are providing you with this determination pursuant to the responsibilities given the State Historic Preservation Office (SHPO) by the regulations at 36 CFR 800. If you have any questions regarding this project, please contact me at (651) 296-3065.

Sincerely,



Jackie Shuss, Historian
Cultural Resources Unit (CRU)

encs.

cc: Joe Hudak, Mn/DOT CRU
Mn/DOT CO File
Mn/DOT CRU Project File
Tony Hughes, D-3 Project Manager



Attachment No. 3

MINNESOTA HISTORICAL SOCIETY

November 5, 2003

Ms. Jackie Sluss
Cultural Resources Unit
MN Dept. of Transportation
Transportation Building, MS 620
395 John Ireland Boulevard
St. Paul, MN 55155

Re: S.P. 4912-61, T.H. 371, from the southern terminus of S.P. 1809-55 south
to Little Falls, Morrison County
SHPO Number: 2001-1501

Dear Ms. Sluss:

We wrote you on 8 September 2003 with a request for clarification on two points related to the above referenced project.

Thank you for your response. Based on this information and the information you submitted previously, we conclude that the project will have no adverse effect on historic resources.

Please note that the above finding is based on:

1. The project plans submitted for the Camp Ripley entrance area with your letter of 24 July 2003.
2. The selection of Alternative C (other alternatives could have an effect on the eligible railroad line).

If there is any change in the above two factors, you should consult further with us. Contact us at 651-296-5462 with questions or concerns.

Sincerely,

Britta L. Bloomberg
Deputy State Historic Preservation Officer